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Manteca, CA 95337
December 29, 1999

Steve Ritchie, Acting Director
CALFED Bay-Delta Program
1416 9th St., Suite 1155
Sacramento, CA 95814

Dear Steve:

The purpose of this letter is to recapitulate some of the analyses and process proposals that have been discussed in recent months but not yet adopted or adequately responded to before year's end. I realize that the schedule for completion of the PEIS makes it difficult to make all the analyses needed for a defensible ROD. However, the ROD must be defensible.

CALFED's mission statement commits that "Solutions will solve problems in all problem areas. Improvement for some problems will not be made without corresponding improvement for other problems". Also CALFED's commitment to avoid "redirected impacts" has been stated repeatedly. Yet CALFED's scope and process and analyses do not yet provide compliance with these assurances. The public will understand this policy wording to refer to improvement from present conditions in spite of a growing population, and not from some past condition of lower population, fewer exotic species, etc..

Acquisitions of Land and Water

My November 29 letter to you and Secretary Nichols proposed that CALFED commit to an independent technical review of potential third party, redirected, and cumulative impacts before any acquisition proposal is adopted. FONSI's prepared by project proponents typically obfuscate and understate third party impacts, and then directly or indirectly declare that admitted impacts are (in their judgment) insignificant or unimportant when compared to the benefits to transferor and transferee (e.g., USBR's 12/22/99 water transfer proposal). CALFED has neither adopted this process proposal nor rejected it with an explanation.

Through Delta Water Conveyance

My September 21 letter proposed a thorough presentation and discussion of the design of the through-Delta conveyance proposal and the flow regimes that would result, and the effect of the proposal on various objectives. My letter listed examples of specifics that should be analyzed and discussed. Those examples should also have included in-channel salinity and the effect of the design on meeting dissolved oxygen standards in the San

Joaquin channel near Stockton and also downstream through the Central Delta.

My request led to a brief generalized presentation before BDAC, but no analysis was presented that responded to any of the specific questions. For example, the question of control of flow through Georgiana Slough was merely dismissed without explanation on the basis that some undisclosed prior analysis rejected it. (Also see December 17 letter from Winther to Horton).

Depletion of Natural Resources

CALFED has not addressed the long term consequence of continuing to meet the needs of a growing population by depleting natural resources. My October 30 letter requested an examination by CALFED of the long term consequences of continuing to overdraft groundwater. The request was endorsed by BDAC Vice-chair Sunne McPeak and was discussed in our meeting with Secretaries Nichols and Lyons. What is being done about this?

We are also destroying natural resources by accumulating many tens of millions of tons of imported salt in soils and groundwaters south of the Delta. This has a side effect of also salting up the San Joaquin River. Why does CALFED consider it important to reduce the salinity of water exported to urban areas outside the Central Valley but not important to restore a salt balance in the San Joaquin and Tulare basins? What will be the impact on society if we continue the gradual destruction of one of the world's most fertile food producing regions?

The above is not a complete list of essential issues and needed analyses and process improvements. However, it includes matters that I believe are both essential to CALFED's success and not clearly and adequately being addressed. Thank you for your attention to these concerns.

Sincerely,



Alex Hildebrand

cc Secretary Nichols
South Delta Water Agency

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